

United States District Court

DISTRICT OF DELAWARE

In the Matter of the Search of

(Name, address or brief description of person or property to be searched)

Two US Mail parcels addressed to Townsend,
DE, described more particularly on
Attachments A(1) and A(2)

**APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT**

CASE NUMBER: 07- 115M

I Michael O' Shaughnessy being duly sworn depose and say:

I am a(n) United States Postal Inspector and have reason to believe

that on the person of or on the premises known as (name, description and/or location)

two US Mail parcels described above

REDACTED

In the _____ District of Delaware
there is now concealed a certain person or property, namely (describe the person or property)

See Attachment B (see back)

which is (give alleged grounds for search and seizure under Rule 41(b) of the Federal Rules of Criminal Procedure)

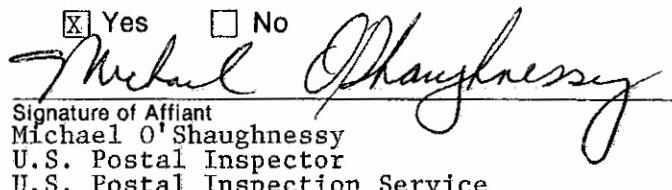
contraband and evidence of a crime

in violation of Title 18 United States Code, Section(s) 2252A
The facts to support the issuance of a Search Warrant are as follows:

see attached affidavit

Continued on the attached sheet and made a part hereof.

Yes No


Signature of Affiant
Michael O'Shaughnessy
U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to before me, and subscribed in my presence

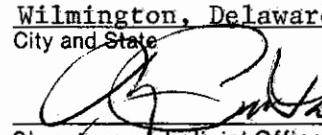
Date June 8, 2007

at Wilmington, Delaware

City and State

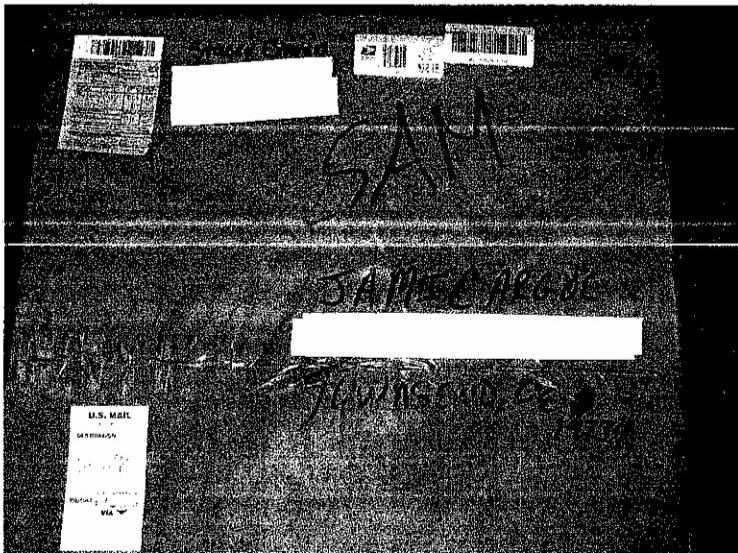
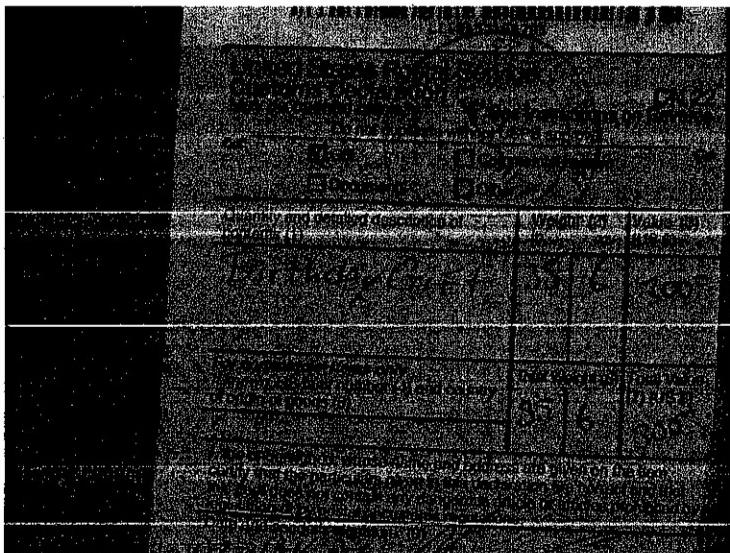
Honorable Mary Pat Thyng
United States Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

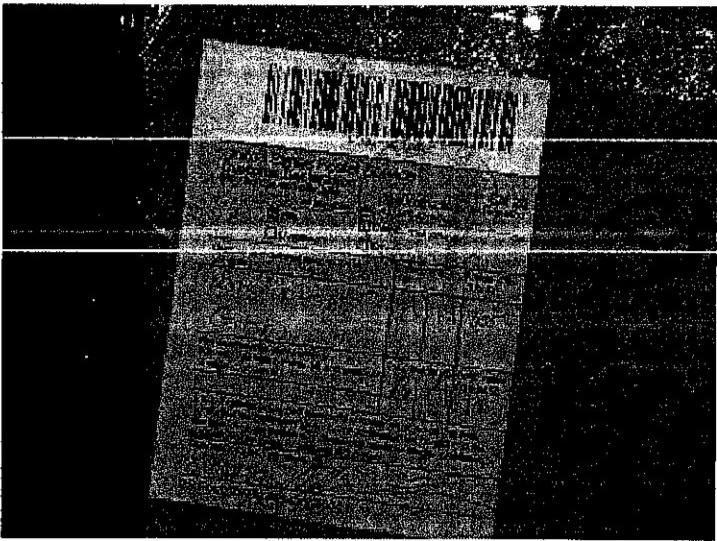
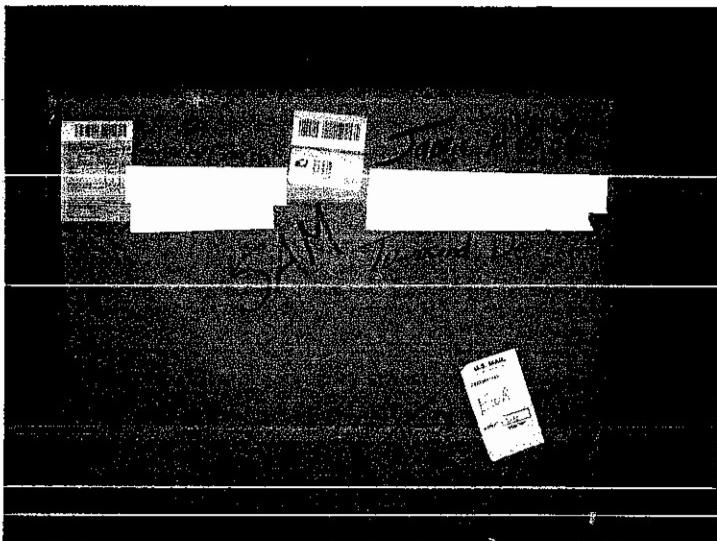
ATTACHMENT A (1)

The item to be searched is described as a United States Mail parcel addressed to Jamie Argoe, The return address on the parcel is Stacey Craven, . A United States Postal Service Customs Declaration Label affixed to the parcel states the contents of the parcel is a Birthday Gift.



ATTACHMENT A (2)

The item to be searched is described as a United States Mail parcel addressed to Jamie Argoe,
parcel is Stacey Craven,
Customs Declaration Label affixed to the parcel states the contents of the parcel is
a Mother's Day Gift.



ATTACHMENT B

ITEMS TO BE SEIZED

The following materials which constitute evidence of the commission of a criminal offense, contraband, the fruits of crime, or property designed or intended for use or which is or has been used as the means of committing a criminal offense, namely violations of Title 18, United States Code, Sections 2252 and 2252A.

1. Any visual depiction of minor(s) engaged in sexually explicit conduct or child erotica in any format or media including, but not limited to, computer images.
2. Computers, keyboards, tapes, cassettes, cartridges, streaming tape, commercial software and hardware, computer disks, disk drives, monitors, computer printers, modems, tape drives, disk applications programs, data disks, system disk operating systems, magnetic media floppy disks, hardware and software operating manuals, tape systems, hard drives, digital cameras, scanners, and other computer related operation equipment.
3. Evidence in any format of computer visits to sites containing child pornography, including but not limited to websites, newsgroups, and chat rooms.

AFFIDAVIT

I, Michael O'Shaughnessy, being duly sworn, state the following

1. I make this affidavit in support of an application for warrants to search two United States Mail parcels and the computers within. The parcels are addressed to Jamie Argoe, , Townsend DE 19734. The return address on both parcels is Stacey Craven, . United States Postal Service Customs Labels affixed to the parcels state the contents of one parcel is a Birthday Gift (35lbs 6oz.) and the other is a Mother's Day Gift (23lbs.14oz.). A more complete description of the parcels and photographs are attached to this affidavit as Attachments A(1) and A(2) and they are incorporated by reference. I have probable cause to believe that enclosed within the parcels are computers containing child pornography, being evidence, fruits and instrumentalities of violations of Title 18, United States Code Sections 2252 and 2252A. A more complete description of the items to be seized is attached to this affidavit as Attachment B and is incorporated by reference. Since this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, fruits and instrumentalities of violations of Title 18, United States Code, Sections 2252 and 2252A are present at the locations described above.

- 2 I am an Inspector for the United States Postal Inspection Service ("USPIS"), assigned to the Philadelphia Division, Philadelphia, PA and have been employed by the USPIS for approximately nine years. I am responsible for investigations involving the trafficking of child pornography through the United States mails. I am further responsible for enforcing federal criminal statutes involving the sexual exploitation of children, pursuant to Title 18, United States Code Sections 2251, 2252, and 2252A. I have participated in the execution of approximately 40 search warrants, and seized evidence in investigations involving the sexual exploitation of children. I have received training and actual experience relating to Federal Criminal procedures, Federal Statutes and United States Postal Inspection Service regulations. I have received training and instruction in the field of investigation of child pornography and have had the opportunity to conduct, coordinate and/or participate in numerous investigations relating to the sexual exploitation of children.
3. Based on my own training and experience and the experience of law enforcement officers, I know that child pornographers/collectors almost always maintain and possess their materials in the privacy and security of their own homes. Child pornographers/collectors typically retain these materials for many years, and they rarely destroy these materials unless their activities are uncovered by law enforcement officials or others
4. Based on my training and experience and the experience of other law enforcement officers, I am aware that child pornographers/collectors often retain materials in a

variety of media, including but not limited to, computers, VHS tapes, DVDs, still images, magazines and/or CD-ROMs or floppy disks.

The Investigation +Background

5. On May 9, 2007, information was received from Postal Inspector Joseph E. Costello reporting the Air Force Office of Special Investigations (AFOSI), Spangdahlem Germany requested the assistance of the U.S. Postal Inspection Service in a Child Pornography investigation. According to Inspector Costello, AFOSI identified Senior Airman (E-4) Christopher Craven, 52nd Maintenance Operations Squadron for possessing Child Pornography. Craven subsequently told the agents he mailed the computers back to his mother-in-law so she could dispose of the evidence. Both parcels were mailed out by surface mail on Monday May 7, 2007. Craven told the agents that he and his wife, Stacy Craven called the mother-in-law in Delaware and advised her of the situation. Craven then said the mother-in-law said for him not to say anything, deny everything and destroy the computers. Craven said that he mailed the computers to her so she could destroy the computers. The parcels are approximately the size of a Dell computer carton wrapped in brown paper. One of the parcels has markings saying happy mother's day and the other happy birthday. The parcels are addressed as follows: Jamie Argoe, Townsend, DE.

6. On May 9, 2007, your affiant contacted postal authorities Townsend DE and instructed them to contact me when the above mentioned parcels arrived at the Townsend, DE Post Office
7. On or about May 22, 2007, your affiant received the following information from Special Agent Zachary Daniels, AFOSI, Spangdahlem, Germany:
 - 7a. On May 7, 2007, Amanda A. Lovelace, a dependent spouse of an active duty military member, informed United States Air Force, Office of Special Investigations Detachment 518 (AFOSI) that she received information from Kristy Adams, another dependent spouse of a military member that Christopher Craven's wife, Stacey Craven, told Adams she saw child pornography on Christopher Craven's computer
 - 7b. On May 7, 2007, Kristy Adams was interviewed by AFOSI. Kristy Adams stated that in the beginning of April, 2007 Stacey Craven called her and was crying and upset. Adams stated Stacey Craven advised her she found pornography on Christopher Craven's computer featuring small girls. Adams stated she asked Stacey Craven if she was going to report Christopher Craven to AFOSI and she responded by asking Adams not to tell anyone.
 - 7c. On May 8, 2007, Stacey Craven was interviewed by AFOSI. Stacey Craven stated

that in mid-February she noticed pornography on Christopher Craven's computer. Stacey Craven further stated she discovered a file that contained adult pornography, child pornography, and seven downloaded videos that contained child pornography. Stacey Craven advised she confronted Christopher Craven about the images. According to Stacey Craven, after arguing about it, they decided to mail both computers in their home to Stacey Craven's parents in Dover, DE. Stacey Craven disclosed that she coordinated with her parents to have both computers mailed to them. Stacey Craven stated her husband, Christopher Craven, mailed two computers to , Townsend, DE 19734. Stacey Craven reported she assisted with carrying both computers to the car. She further reported that her husband dropped her off at work and then mailed both computers from the Air Force Base

7d. On May 8, 2007, after Article 31 advisement, AFOSI interviewed Christopher Craven. Christopher Craven confessed to searching the internet and using key words such as "15 or 16 year old girls," "Pre-teens," "young girls," "Lolita," "Little Girls," "Illegal girls," and "underage girls." When conducting his searches for images in video and still format. Christopher Craven also disclosed he searched for child pornography approximately once a week and masturbated to orgasm while viewing these images. Christopher Craven stated his wife, Stacey Craven, telephoned her mother after Amanda Lovelace threatened to turn Christopher Craven in to authorities. Christopher Craven stated Stacey Craven's mother advised he to "get rid of" Christopher Craven's computer and to make Stacey Craven's computer disappear.

Christopher Craven further stated that on May 7, 2007, between 1215 and 1315 hours, he used the Air Force Base Post Office and United Stated Postal system to mail both computers to Stacey Craven's mother. According to Christopher Craven, the computers were boxed separately by Christopher Craven and wrapped in brown paper. Christopher Craven stated his computer is in a box with a mislabeled customs tag stating "Mother's Day Gift." Christopher Craven also stated Stacey Craven's computer is in a box with a mislabeled customs tag stating "Birthday Gift."

8. On or about May 14, 2007, your affiant received information from the Townsend, DE Post Office reporting the above mentioned parcels were received on that date.
9. On or about May 14, 2007, your affiant contacted Postal Inspector Yvette Thomas and instructed her to retrieve the above mentioned parcels from the Townsend, DE Post Office.
10. On or about May 15, 2007, your affiant obtained the above mentioned computers from Postal Inspector Thomas.
11. On June 1, 2007 your affiant confirmed Jamie Argoe is currently receiving mail at , Townsend, DE 19734.

Search and Seizure of Computer Equipment

12. This affidavit requests authority to search any computers and any other devices which

can store documents and images in electronic form. Based on the circumstances of this offense as described herein, and based upon my training, education, and experience, individuals who solicit and deal in illegal pornographic material via the Internet often retain email, pictures, and electronic data pertaining to their dealings on their computers and on other media for electronic storage. Also, such individuals will often print and retain pictures depicting illegal pornographic materials. Consequently, in order to conduct a thorough examination of the content on computers and computer storage media, it is necessary to examine all of the files, programs and data which exist on any computers and storage media. For the reasons set forth below, authority is requested to remove the computers and computer storage media to another location where such computers and other electronic storage devices may be examined in their entirety by a qualified computer examiner. Any such equipment, data storage devices and related materials found not to contain evidence of the specified federal offenses will be returned to the subject premises.

13. Based upon my prior consultation with an expert in computer searches and data retrieval from computers and related media, and consultations with other Inspectors or Agents or law enforcement officers who have been involved in the search of computers and retrieval of data from computer systems, I know that searching and seizing information from computers often requires Inspectors or Agents or law enforcement officers to seize all electronic storage devices (along with related peripherals) to be searched later by a qualified computer expert in a laboratory or other controlled environment. This is true because of the following: Computer storage devices (like hard disks, diskettes, tapes, laser disks, CD-ROMs) can store the

equivalent of thousand of pages of information. Additionally, a suspect may try to conceal criminal evidence; he or she might store it in random order with deceptive file names. This may require searching authorities to examine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and application, so it is often times difficult to know before a search which expert is qualified to analyze the system and its data. In any event, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden" erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (either from external sources, or from destructive codes embedded in the system as a "booby trap"), a controlled environment is essential to its complete and accurate analysis.

14. Based upon the foregoing, it is believed that evidence of violations of Title 18, United States Code, sections 2252 and 2252A will be located within the United States Mail parcels addressed to Jamie Argoe, , Townsend, DE 19734 with return addresses of Stacey Craven, with a United States Postal Service Customs Declaration Labels affixed to the parcels stating the contents of one of the parcels is a Birthday Gift and the other is Mother's Day Gift..

Conclusion

15. Based upon the information above, I have probable cause to believe that violations of Title 18, United States Code, Sections 2252 and 2252A have been committed and that the items described in Attachment B are evidence, fruits, and instrumentalities of those violations and are located within the United States Mail parcels addressed to Jamie Argoe, , Townsend, DE 19734 with return addresses of Stacey Craven, P 3 with United States Postal Service Customs Declaration Labels affixed to the parcels stating the contents of one parcel is a Birthday Gift and the other is a Mother' Day Gift. By this affidavit, I request that the Court issue warrants authorizing a search of the United States Mail parcels and computers within. The parcels are addressed to Jamie Argoe, , Townsend, DE 19734 with return addresses of Stacey Craven, , with United States Postal Service Customs Declaration Labels affixed to the parcels stating the contents of one parcel is a Birthday Gift and the other is a Mother's Day Gift and the seizure of the items described in Attachment B. After the parcels are opened, if they are found to not contain a computer or other

storage device for digital data, then the search will be suspended.

Dated June 8th, 2007

Michael O'Shaughnessy

Michael O'Shaughnessy
U.S. Postal Inspector

Subscribed and sworn before me this 8 day of June 2007

Mary Pat Thyng

Honorable Mary Pat Thyng
United States Magistrate Judge